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State of New Jersey

CHRIS CHRISTIE
Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTIN
Acting Commissioner

Bureau of Case Management
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Certified Mail No.

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Daniel Kopcow
Weston Solutions Inc
205 Campus Drive
Berkeley Heights, NJ 08837

March 17, 2010

Approval

Re: Revised Interim Remedial Measure Remedial Action Workplan for LNAPL Removal, dated February 24, 2010 and associated Response to Comment Letter, dated February 18, 2010.
Hartco Chemical Corporation
1020 King George Post Road
Fords, Woodbridge Twp, Middlesex County, NJ
PI No.: G000003943, EA No.: RPC000001

Dear Mr. Kopcow:

The New Jersey Department of Environmental Protection (Department) has completed its review of the Revised Interim Remedial Measure Remedial Action Workplan (IRM RAWP) Light Non-Aqueous Phase Liquids (LNAPL) Removal dated February 24, 2010 and the associated Response to Comment (RTC) Letter dated February 18, 2010. The February 2010 IRM RAWP and February 2010 RTC Letter were submitted by Weston Solutions for the Hatco Site in Woodbridge Township, New Jersey. The Department has determined that the February 2010 IRM RAWP and February 2010 RTC Letter are in compliance with the Technical Requirements for Site Remediation (TRSR) N.J.A.C. 7:26E and other applicable requirements. The Department hereby approves the February 2010 IRM RAWP and RTC Letter effective the date of this letter, with the following clarifications.

1. Weston shall clarify which wells will be gauged for LNAPL while the recovery well/trench system is operating and during the excavation work, as the IRM RAWP only references wells that will be gauged during the post-IRM LNAPL confirmation sampling program. The LNAPL gauging program, while the IRM is ongoing and as part of the post-IRM confirmation sampling, should also include monitoring wells along the western property boundary (i.e. MW45S, MW46S, MW48S and MW49S), the southern property boundary (i.e. MW1S, MW5S, MW6S, MW7S, MW47S), and additional wells outside the plume boundary (i.e. MW8S, MW9S, MW10S, MW18S, MW22S, MW53S, etc).

2. Prior to construction of the Phase I recovery well/trench system, Weston shall collect groundwater level measurements and determine pre-IRM LNAPL thicknesses in **all** on- and off-site monitoring wells, including those outside the "current LNAPL plume boundary."

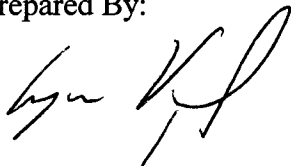
3. The IRM RAWP stated, "The updated Addendum 3 will detail the groundwater sampling program that will be implemented following the 2 year post-IRM product recovery monthly monitoring program." Weston shall submit the post-IRM groundwater sampling program as a separate document and include a discussion of long-term groundwater monitoring for the entire site. Weston should not limit the discussion to the portion of the LNAPL plume that is being remediated via the recovery well and trench system.

Weston shall submit the list of monitoring wells that will be gauged for LNAPL during the IRM within 30 days of receipt of this correspondence. Weston shall implement the IRM RAWP within 60 days of receipt of this correspondence. Weston shall also submit the post-IRM groundwater sampling program within 60 days of finalizing the design of the Phase 2 recovery well/trench system.

Weston shall implement the IRM RAWP and submit the required information by the dates indicated, or submit a written request for an extension at least 2 weeks prior to the due date. Failure to implement the IRM RAWP may result in the initiation of enforcement action.

If you require copies of Department Guidance Documents or applications, many of these are available on the internet at <http://www.state.nj.us/dep/srp>. If you have any questions regarding this matter contact Lynn Vogel, Case Manager at (609)984-5311 prior to the date indicated.

Prepared By:



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Bureau of Case Management

Reviewed By:



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Bureau of Case Management

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